



# CHARTER STEEL

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June 11, 2007

Mr. Robert Eckdale  
Bureau of Air Management  
WI Dept. of Natural Resources  
PO Box 7921  
Madison, WI 53707

Subject: Comments on Clean Air Mercury Rule – NR 446

Dear Mr. Eckdale,

The purpose of this letter is to provide comments on behalf of Charter Steel regarding NR 446 and the Clean Air Mercury Rule. Charter Steel is a Wisconsin based manufacturer of high quality carbon and alloy steel bar, rod and wire. Charter Steel currently spends well over \$1 million dollars each month for electricity required to meet our manufacturing needs in Wisconsin. Electricity rates have been rising steadily in Wisconsin and in other states in which Charter Steel conducts business. In recent years rates have risen faster in Wisconsin than in other states in the Midwest and currently surpass the Midwest average. Charter Steel faces competitive pressures both domestically and globally and as such we are concerned about the potential electric rate impacts of the proposed changes to NR446 and our ability to remain competitive in Wisconsin.

Charter Steel respectfully requests that the Department of Natural Resources adopt the US Environmental Protection Agency's CAMR as the most cost effective approach to reducing power plant emissions of mercury.

Requiring stricter mercury emissions reductions than the Federal model has the potential to significantly increase costs to Wisconsin businesses and to create a competitive disadvantage with similar industries in other states and countries. Charter Steel is not aware of any cost-benefit analysis that has been completed for the proposed changes but past cost estimates to achieve a 90% mercury reduction have been extraordinary.

If Governor Doyle and the DNR wish to have stricter emission reductions than the Federal model then Charter Steel believes that the DNR should not revise NR446 but have specific legislation drafted to that effect.

Charter Steel would also request that the DNR consider that any changes allow for maximum flexibility in meeting the requirements including potential participation in the national trading program and the creation of potential "off ramps" for technology that is "cost effective and technically feasible".

As a state that is heavily dependent on its manufacturing base and on coal fired electrical generation, Wisconsin cannot afford to ignore the connection between environmental policy, economic development and energy costs.

Charter Steel respectfully submits these comments relative to NR446 and CAMR and urges the DNR to ensure that any changes to mercury emissions regulation are crafted to minimize cost and reliability impacts of electricity available in Wisconsin.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Schroeder", with a stylized, cursive script.

Matt Schroeder  
Charter Steel